

October 4, 2006

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Commission's Secretary
Attn: WTB/ASAD
Office Of The Secretary
Federal Communications Commission

RE: DA 06-1810 / AU 06-170

Auction 70 Comments

I, Carrie LeAnn Riordan, formally submit this comment letter for the upcoming FM Auction 70. In specific, my purpose is to ask the Commission for a minimum opening bid reduction for FM620 (Channel 295A) at Ephraim, Wisconsin, from \$7,500 to \$2,500. I have a professional interest and knowledge of FM620's proposed service area, as I am the original designer/petitioner of said permit.

Another, similar Class A property auctioned off in Auction #60 for new service in Sister Bay, Wisconsin (FM143) is in FM620's same service area and was started at the minimum opening bid of \$5,000.

I believe this second service to the area may actually end up being a minimum or "sub" Class A service signal for a few primary reasons, short spacing, and extremely scarce tower space availability for lease or construction.

While knowing the importance, and having the desire to give Ephraim it's first aural service, it is my belief that

before things even get started for FM620, there will be several hurdles to overcome.

The following, I believe, warrants a lowering of the minimum opening bid for FM620 Ephraim:

1. **Geographically Challenged Area:** The Northern Door County Peninsula is actually an island, 40 miles from North to South, and 15 or so miles at it's widest point East to West. The waters of Green Bay are on one side of the island, and Lake Michigan on the other. This area is very protected for wildlife and continues to boast extremely controlled, environmentally friendly growth.
2. **Lack of area tower space:** A check of FCC/FAA registered tower sites in the area within proposed the 60db curve shows a possible 4, 2 of which are under 100 feet and are primarily used for cellular phone service. A quick call into one of the tower's owners shows a need for a tower load survey which will cost thousands of dollars just to find out if there is even a *possibility* of leasing space.
3. **Short-Spacing Issues:** Use of any existing tower space in the established aforementioned area will short space FM620 Ephraim to Channel 297C3 (WXPT) Powers, Michigan. Any hypothetical or possible site area near or South of Ephraim will resort in short spacing Channel 296A (WOCO) Oconto, Wisconsin. The coordinates where FM620 is originally petitioned is a very small plot of land that is the only area where FM620 could ever achieve full Class A status. These coordinates may have made engineering sense, but will

not work in reality. This especially illustrates the argument that FM620 should have a lower opening bid than FM143 in Auction #60 as the property's value as a more than possible short-spaced Class A will ultimately be less.

4. **Population Comparison:** The area within the proposed 60db curve contains less than 5,000 year round residents, making the proposed very much in line with other \$2,500 minimum opening bid properties.

I hope you will take all of these points into consideration, lower the minimum opening bid, making it a bit easier for the possible first time owner to achieve her dream of owning and operating a commercial FM signal.

Respectfully submitted,

Carrie LeAnn Riordan